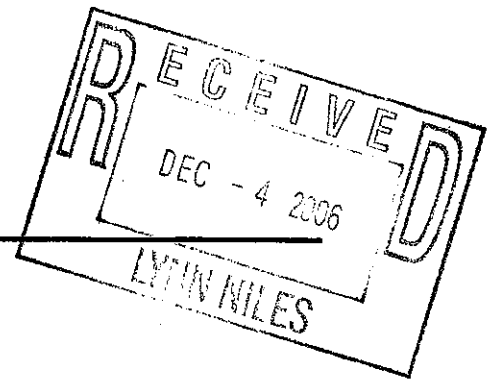




SHERWIN-WILLIAMS.



THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

November 29, 2006

Mr. Raymond Klimcsak
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RE: Proposed Soil and Sediment Sampling and Analysis Protocol
Incorporating X-Ray Fluorescence (XRF)
Sherwin-Williams Gibbsboro Sites

Dear Mr. Klimcsak:

Sherwin-Williams began the Strategic Sampling program at the Gibbsboro sites in June 2005. Since that time, more than a thousand soil and sediment samples have been collected and analyzed, and, with the concurrence of the United States Environmental Protection Agency (USEPA), the use of X-Ray Fluorescence (XRF) as a field screening tool has been incorporated into the field sampling program at Hilliard Creek. The knowledge of site conditions gained from the Strategic Sampling was not available at the time the USEPA approved the November 2003 Work Plan, and use of XRF was not originally included as a soil and sediment sampling tool. Sherwin-Williams has developed for the USEPA's consideration the following proposal to modify the soil and sediment sampling protocol as described in the November 2003 Work Plan. This protocol has been developed in a manner that will allow it to be applied at most soil and sediment sampling locations.

Presented below are discussions of how the protocol would be applied at an individual boring and at subsequent "step-out" borings. Attached as Figure 1 is a hypothetical example showing how, based on XRF results, the depths of borings would be determined, and samples would be selected for laboratory analysis.

Sampling Protocol

Soil and sediment samples will be obtained from the surface (the 0" – 6" interval) and from sequential two-foot intervals (1.5' – 2.0', 3.5' – 4.0', 5.5' – 6.0', etc.). The XRF unit will be used to screen each soil or sediment sample until, based on the XRF results, the screening criteria are achieved. An additional confirmatory sample will then be collected from the next deeper two-foot interval and analyzed with the XRF unit. **NOTE:** If the 0" – 6" sample

does not contain lead or arsenic at a concentration greater than screening criteria, a sample would still be obtained from the 1.5' – 2.0' interval. Therefore, the field team would always screen the upper two intervals with the XRF unit.

If the deeper confirmatory sample is also "clean", no additional vertical samples would be obtained. If, however, the XRF results find lead or arsenic above screening criteria in the deeper sample, additional samples would be obtained from the next two-foot interval until the XRF screening finds the criteria were achieved. A confirmatory sample would also be collected from the next deeper two-foot interval. This protocol will provide for a high degree of certainty that vertical delineation is achieved because two sequential two-foot sample intervals containing neither lead nor arsenic at a level above the screening criteria will be collected before vertical sample collection is terminated.

Sample Analysis

Samples would be collected for analysis from the surface and the two-foot interval at which vertical delineation is achieved, based on the XRF results. If neither the surface soil sample nor the sample collected from the 1.5' – 2.0' interval was found to contain lead or arsenic at a level greater than the screening criteria, only the surface sample would be sent for laboratory analysis.

A sample will also be obtained for laboratory analysis from the intermediate depth interval at which the XRF screening finds the highest lead and/or arsenic concentrations. If the highest levels are found at the 1.5' – 2.0' interval (which will be collected in any location where lead or arsenic is found above screening criteria), the interval with the second highest levels of lead and/or arsenic would be collected for laboratory analysis.

In summary, there are three possible sampling and analysis scenarios:

Scenario 1: XRF screening finds neither lead nor arsenic above criteria in either the 0" – 6" or 1.5' – 2.0' intervals.

- Collected and analyzed with the XRF unit: samples from the 0" – 6" and 1.5' – 2.0' intervals
- Sent for laboratory analysis: the sample from the 0" – 6" interval.

Scenario 2: XRF screening finds that only the 0" – 6" interval contains lead or arsenic at levels above the screening criteria.

- Collected and analyzed with the XRF unit: Samples from three intervals – 0" – 6", 1.5' – 2.0' and 3.5' – 4.0'
- Sent for laboratory analysis: Samples from the 0" – 6" and 1.5' – 2.5' intervals.

Scenario 3: XRF screening finds multiple intervals with lead and/or arsenic at concentrations greater than the screening criteria.

- Collected and analyzed with the XRF unit: Samples from the 0' – 6', 1.5' – 2.0', all two-foot intervals containing lead or arsenic above screening criteria, the two-foot interval at which vertical delineation is achieved, and a confirmatory sample from the next deeper two-foot interval.
- Sent for analysis: Samples from the 0" – 6", 1.5 – 2.0' intervals, the interval at which vertical delineation is achieved, and the interval containing the highest concentrations of lead and/or arsenic.

Hypothetical Application

Figure 1 presents a hypothetical example of how the proposed sampling protocol would be applied at a hypothetical boring. Using the protocol at the "initial perimeter boring" (such as the fence line boring in the Wawa parking lot), the surface and two-foot intervals would be sampled until the 9.5' – 10.0' interval, where both lead and arsenic were found to be below their respective screening criteria. At that point, the boring would be extended and a sample obtained from the 11.5' – 12.0' interval. In this example, lead and arsenic levels in the 11.5' – 12.0' sample are below the screening criteria; therefore, the depth of the boring would be terminated.

As per the protocol, four samples would be collected from the hypothetical boring:

- The samples obtained from the surface and 1.5' – 2.0' interval,
- The sample from the 5.5' – 6.0' interval, where the highest arsenic and lead levels are found, and
- The sample from the 9.5' – 10.0' interval, where vertical delineation to the screening criteria was achieved.

Use of Protocol for Horizontal Delineation

When additional samples are collected for horizontal delineation ("step-out borings"), as will be the case when borings are installed in the Wawa parking lot adjacent to the Dump Site or samples are collected from the exterior locations on the stream transects, the results of the XRF analysis of the initial boring will be known. This means that the field team will understand the vertical profile of COPCs in soil, including the depth at which vertical delineation is achieved in the initial boring.

Subsequent step out borings would use the same XRF screening approach, but, regardless of the XRF results, would always be completed to at least the depth at which the immediately adjacent boring was vertically delineated. Again referring to Figure 1, the hypothetical initial/perimeter boring is shown to be vertically delineated at the 9.5' – 10.0' interval. Therefore, the first step out boring would be completed to a minimum of 10 feet, even though, in the hypothetical example, the XRF results show vertical delineation at 5.5' – 6.0'. Similarly, as illustrated in the hypothetical example on Figure 1, the second step out boring would be completed to a depth of 5.5' – 6.0', because this is the depth at which vertical delineation was achieved in the adjacent step out boring, even though vertically

delineation is achieved in the second step out boring at the 1.5' – 2.0' interval.

Summary

The proposed sampling protocol is designed to make effective use of the XRF tool in the field and address the issue of vertical heterogeneity of lead and arsenic in soil and sediment. The protocol would use the XRF screening to determine the depth of the boring and the interval(s) at which the highest concentrations of lead and/or arsenic are likely to be found. Depending upon the vertical profile of lead and arsenic concentrations, up to four samples would be obtained from the boring: Surface, 1.5' – 2.0', the interval with the highest lead and/or arsenic levels, and the vertical delineation depth. Fewer samples would be obtained if the XRF analyses showed vertical delineation at shallow depths.

Samples collected for the purpose of establishing the horizontal extent to which constituents may be present around the perimeter of one of the historic disposal sites or beyond the banks of one of the water bodies would be subject to the same protocol except that the minimum depth of each subsequent step out sample will be the depth at which the adjacent interior sample was found to be vertically delineated.

Should you have any questions or comments, please do not hesitate to contact me at 216-566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director, Remediation Services

Encl.

cc: J. Josephson, USEPA-Reg.2, w/ encl.
M. Pensak, USEPA-Region 2, w/ encl. (2 copies)
J. Doyon, NJDEP, w/ encl. (4 copies)
~ L. Arabia, TtFWI, w/ encl.
H. Martin, ELM, w/ encl.
S. Jones, Weston Solutions, w/ encl.
R. Mattuck, Gradient, w/ encl.
J. Gerulis, Sherwin-Williams, w/o encl.
A. Danzig, Sherwin-Williams, w/o encl.
S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione w/o encl.

Initial/Perimeter Boring


Depth	XRF
0-6"	As 250 Pb 2,000
1.5-2.0'	As 200 Pb 1,500
3.5-4.0'	As 300 Pb 1,000
5.5-6.0'	As 500 Pb 4,000
7.5-8.0'	As 50 Pb 500
9.5-10.0'	As 2 Pb 50
11.5-12.0'	As 1 Pb 20

1st Incremental Step-Out Boring

Depth	XRF
0-6"	As 50 Pb 750
1.5-2.0'	As 150 Pb 1,000
3.5-4.0'	As 200 Pb 2,000
5.5-6.0'	As 6 Pb 300
7.5-8.0'	As 2 Pb 20
9.5-10.0'	As 2 Pb 20

Next Incremental Step-Out Boring

Depth	XRF
0-6"	As 30 Pb 450
1.5-2.0'	As 5 Pb 300
3.5-4.0'	As 2 Pb 30
5.5-6.0'	As 1 Pb 20

LEGEND:  - SAMPLE COLLECTED FOR LABORATORY ANALYSIS As - 8 ppm } SEDIMENT Pb - 50 ppm } DELINEATION CRITERIA As - 8 ppm } SOIL Pb - 400 ppm } DELINEATION CRITERIA	
PROJECT: Gibbsboro RI/FS	
CLIENT NAME: Sherwin-Williams Company	

TITLE: EXAMPLE OF HORIZONTAL & VERTICAL SAMPLING PROTOCOLS	
DATE: Sep 27 2006	FIGURE #: 1

Ms. Mary Lou Capichioni
Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: *Hilliard's Creek Section Recommendations for Remedial Investigation Scope* (November 30, 2005), *Use of XRF Analyses During Remedial Investigation of Hilliard's Creek* (March 6, 2006), *Clarification of Items Related to XRF Screening at Hilliard's Creek* (March 27, 2006), Field Change Request Form #18 *Background Sampling Event - Relocation of Silver Lake Proposed Background Sample Location* (March 3, 2006), *Residential Well Survey Summary* (March 7, 2006), and the March 3, 2006 e-mail correspondence entitled *Pesticide/PCB data from Hilliard's Creek*
Sherwin-Williams Gibbsboro Sites

Dear Ms. Capichioni

EPA has received the following documents submitted by The Sherwin-Williams Company in regards to the Sherwin-Williams Gibbsboro Sites: *Hilliard's Creek Section Recommendations for Remedial Investigation Scope* (November 30, 2005), *Use of XRF Analyses During Remedial Investigation of Hilliard's Creek* (March 6, 2006), *Clarification of Items Related to XRF Screening at Hilliard's Creek* (March 27, 2006), Field Change Request Form #18 *Background Sampling Event - Relocation of Silver Lake Proposed Background Sample Location* (March 3, 2006), *Residential Well Survey Summary* (March 7, 2006), and the March 3, 2006 e-mail correspondence entitled *Pesticide/PCB data from Hilliard's Creek*, and offers the following comments.

The November 30, 2005 document presents the following proposals for the future soil and sediment sampling of Hilliard's Creek, as well as residential sampling; each will be addressed separately and this letter also provides NJDEP comments regarding the November 30th proposal. They include:

- 1) returning to specific identified transects along Hilliard's Creek sampled during the 2005 RI activities and collecting a limited number of soil samples for limited analyses to assist in vertical and lateral delineation;
- 2) establishing screening criteria for soil and sediment samples for arsenic and benzo(a)pyrene based on background results;
- 3) limiting the list of COPCs for future soil and sediment sampling along Hilliard's Creek;
- 4) amending the future soil and sediment sampling approach (limit the lateral extent for soil and sediment sample collection) for the remaining transects along Hilliard's Creek;
- 5) collecting soil samples from pre-selected residential homes; and,
- 6) NJDEP's comments.

1) Comments on Specific Identified Transects along Hilliard's Creek

HCT-20

- EPA concurs with the proposal to collect a (further) lateral delineation sample at the interval specified past HCSB-0101 for TAL metals analysis.
- Soil samples shall be collected from the AF-AG (2.5-3.0 ft.) interval at locations HCSB-0093 and HCSB-0103 for TAL metals analysis. EPA is requiring that a "deeper" interval be sampled based on data collected from sediment samples (during the 2005 RI sampling activities) along this transect which showed exceedances at the 1.5-2.0 ft. interval.

HCT-27

- EPA concurs with the proposal to collect (further) lateral delineation samples south of HCSB-0171 and north of HCSB-0161 at the intervals specified for TAL metals analysis.
- Soil samples shall be collected from the AF-AG (2.5 - 3.0 ft.) interval at location HCSB-0170 (as proposed) and in addition, HCSB-0164 (on the opposite side of Hilliard's Creek) for TAL metals analysis.

HCT-37

- EPA concurs with the proposal to collect a (further) lateral delineation sample past HCSB-0092 at the interval specified for TAL metals analysis. Regarding the proposal for the collection of a soil sample 50 feet south of HCSB-0087, EPA recommends that the transect be visited in the field with members of the SWC and Weston. The specific conditions at this transect are unclear (i.e., whether or not there are two distinct stream channels, or a large "pond"). In addition, access to the southern portion of this transect is still pending; therefore sediment and soil sample collection operations (per the 2003 Work Plan) have not been completed to date.
- A soil sample shall be collected from the AF-AG (2.5-3.0 ft.) interval at location HCSB-0087 for TAL metals analysis.

HCT-103

- Soil samples shall be collected from the AF-AG (2.5-3.0 ft.) interval at locations HCSB-0060 and HCSB-0055 for TAL metals analysis.

HCT-115

- Soil samples shall be collected from the AF-AG (2.5-3.0 ft.) interval at locations HCSB-0044 and HCSB-0049 for TAL metals analysis.

HCT-119

- Soil samples shall be collected from the AF-AG (2.5 - 3.0 ft.) interval at location HCSB-0016 (as proposed) and in addition, HCSB-0024 (on the opposite side of Hilliard's's Creek) for TAL metals analysis.

HCT-125

- EPA concurs with the proposal to collect a (further) lateral delineation sample at the interval specified past HCSB-0033 for TAL metals analysis. (Note: transect is incorrectly referenced in the November 2005 document as HCT-123)

HCT-135

- EPA concurs with the proposal to collect (further) lateral delineation samples, at the intervals specified, north of HCSB-0150 for TAL metals and PAHs analyses; and south of HCSB-0159, for TAL metals and PAHs, and PCB analyses.

HCT-139

- Soil sample HCSB-0133 (As - 9.9 mg/kg) has already been collected to the north of HCSB-0134. Please clarify the location (in proximity to those already collected) of the proposed sample to be collected. Any proposed sample should be analyzed for metals, PAHs, and PCBs.

HCT-147

- EPA concurs with the proposal to collect a (further) lateral delineation sample at the interval specified past HCSB-0193 for TAL metals analysis.

HCT-154

- EPA concurs with the proposal to collect (further) lateral delineation samples north of HCSB-0197 and south of HCSB-0198 at the lateral intervals specified, for TAL metals and PAHs analyses.

2) Establishing Screening Criteria for Soil and Sediment - Arsenic and benzo(a)pyrene

As part of the strategic sampling, a background investigation was conducted. The Sherwin-Williams Company is proposing that the results of the background investigation be used to help determine which constituents to retain and which to eliminate in future sampling events. The data collected from the site will be used in a baseline human health risk assessment. Eliminating contaminants of potential concern based on background may result in the loss of important risk information. The baseline risk assessment approach retains constituents that exceed risk-based screening concentrations. Site-specific background will be considered at the end of the risk assessment, in the risk characterization. Specifically, the contaminants of potential concern with high background concentrations should be discussed in the risk characterization, and if data are available, the contribution of background to site concentrations should be distinguished. (Role of Background in the CERCLA Cleanup Program; OSWER 9285.6-07P; http://www.epa.gov/oswer/riskassessment/pdf/bkgpol_jan01.pdf)

3) Limiting the list of COPCs for Future Sampling along Hilliard's Creek

EPA concurs with the proposed list of COPCs for the remaining Hilliard's Creek transects (soil and sediment samples), the following sampling scheme should apply:

- Transects upstream of HCT-91: TAL metals, PAHs, PCBs in soil and sediment
- Remaining transects: TAL metals and PAHs in soil; TAL metals, PAHs, and PCBs in sediment.

Based on the future review of the data to be collected, additional soil and sediment sampling may be necessary along Hilliard's Creek.

4) Collecting Soil and Sediment Samples along the remainder of the Hilliard's Creek Transects

Presented below are EPA's requirements for the future collection of the soil and sediment samples (including the sample interval spacing and transect selection) along Hilliard's Creek. EPA's requirements are based on an intensive review of the 2005 Hilliard's Creek RI soil and sediment data collected by the Sherwin-Williams Company.

a) Transect Selection

Currently, there are thirty one transects along Hilliard's Creek which remain to be sampled. This total also includes the number of transects for which access was not granted during the 2005 RI activities and were consequently either not sampled, or only partially sampled. EPA requires that the following HCT transects be retained for Phase II sampling: 13, 17, 24, 32, 37, 41, 43, 48, 55, 63, 66, 75, 87, 93, 95, 107, 129, 133, 143, 151, and 153. Consideration for the selection of the proposed transects by EPA was based on the review of the 2005 RI data and the need to fill sediment and/or soil quality data gaps.

EPA's rationale for recommending particular transects for sample collection was partially based on the specific creek characteristics (hydro-dynamics) present. In other words, a greater distance between sampled transects in areas where Hilliard's Creek was "defined" and fast moving, whereas, a smaller (tighter) distance between transect spacing is required where the creek channel either loses (lost) definition or there is the potential for (much more) seasonal inundation. The later is of particular interest due to the fact that the 2005 RI data has shown that even in downstream areas (presumably greater distances from the source area) concentrations of inorganics, among other compounds, are just as high or if not higher than they are along upstream transects. This was generally seen in areas where the creek does not have a well defined channel, or is subject to seasonal inundation (for instance, HCT-20); as opposed to a very narrow creek channel (for example, HCT-67).

b) Sediment Sample Spacing and Collection Intervals

EPA concurs with the Sherwin-Williams Company proposal to collect sediment samples at 10 ft. intervals as opposed to the 5 ft. intervals. However, the 2005 RI sediment sampling activities did not establish/confirm (verify) the extent of vertical sediment contamination, nor does the November 2005 proposal address this matter. Therefore, it is recommended that the following sediment sampling intervals be utilized: 0-6 inches and 2.5 - 3.0 ft throughout the remaining transects.

Based on the results of these future activities it may be necessary to return to particular transects and collect samples to determine the vertical extent of sediment contamination.

c) Soil Sample Spacing and Collection Intervals

i) Lateral Spacing - All remaining transects are to be sampled in the following manner. Two soil samples will be collected within the first 20 ft. from the creek's edge/ "top of stream bank" (as opposed to every 5 ft. - for the first 20 ft. One sample is to be collected immediately adjacent to the creek's edge, the next approximately 20 ft. (up the flood plain) from the first sample. This approach is to be used for samples collected on either side of the creek. The rationale for this

recommended sample spacing is based on the fact that a majority of the remaining transects proposed experience greater sediment deposition/exhibit greater sediment seasonal inundation, or have more than one tributary - therefore the creek's "bank" is not easily defined or located. This spacing will address the variability of the creek's definition. The remaining samples along the transects are to be sampled at 50 ft. intervals, in accordance with the proposal presented in the November 30, 2005 SWC document.

ii) Vertical Spacing - Soil samples at the creek's edge/ "top of the stream bank" and at 20 ft. from the creek's edge are to be collected at the following vertical intervals: 0-6 inches and 24-30 inches. These vertical intervals are to be used, regardless of the depth to water (dtw) - although it is still recommended that dtw be recorded. This rationale is based on the fact that vertical delineation was not confirmed in any area due to the dtw; however, exceedances were very common. Due to the fact that the remaining transects are in the same general areas as the locations of the 2005 transects, it can be expected that the dtw within the first 20 ft. of the creek's edge will not vary. In addition, due to the fact that the dtw (for a large majority of the transects) for the proposed samples along the recommended transects will always be less than 1 ft., the 0-6 interval will meet the requirements of collecting a sample above the saturated zone. The second proposed interval will attempt to define the extent of vertical contamination.

Vertical spacing for the remaining soil samples (at 50 ft. intervals) are to be collected in accordance with the June 9, 2004 Work Plan for RI/FS Activities (Gibbsboro, NJ) *Addendum #1*, submitted by the SWC.

5) Residential Sampling

EPA concurs with the sampling approach outlined by the Sherwin-Williams Company in the November 30, 2005 memo since it is consistent with EPA's June 9, 2004 Work Plan for RI/FS, Addendum #1 letter. However, samples shall be analyzed for full TAL/TCL analyses for consistency reasons presented during the December 7, 2005 meeting. In addition, EPA has reviewed Gradient Corporation's proposed approach for residential sampling and provides the following response. EPA has previously addressed the topic of lead sampling at residential properties in a July 30, 2003 memo from EPA to the Sherwin-Williams Company. The referenced EPA memo is attached (Attachment #1).

6) NJDEP's Comments

a) On page 2 of the November 30, 2005 letter, it is stated that the most stringent NJDEP Soil Cleanup Criteria (SCCs) or EPA Region 9 Preliminary Remediation Goals (PRGs) were selected as the screening criteria for soils and the most stringent NJDEP Ecological Screening Criteria or the published Lowest Effects Level (LEL) will be used for sediment evaluation. The

Department requires clarification that wetlands/riparian soils, being designated environmentally sensitive areas (ESAs) pursuant to N.J.A.C.7:26E-3.11, are to be compared to the ecological soil screening criterion for lead. Screening criterion frequently used by NJDEP are 740 mg/kg (USDOE 1997), the sediment LEL of 31 mg/kg and the Severe Effects Level (SEL) of 250 mg/kg.

b) In regard to sediment, Sherwin-Williams should be advised that NJDEP screening criteria and LELs are one and the same (in other words, NJDEP's Guidance for Sediment Quality Evaluations, November 1998, cites the Ontario screening values for use in NJ). Future deliverables must correctly cite the sediment screening values as the Ontario LELs (Persaud et al., 1993).

c) The figures provided in the November 30, 2005 correspondence are not adequately labeled. These should be revised to include labels for water bodies, The Paint Works facility and other Sherwin-Williams related AOCs/source areas, and streets. This comment was stated during the December 7, 2005 meeting with USEPA, NJDEP, Sherwin-Williams and their representatives. Sherwin-Williams agreed, at the meeting, to rectify this issue.

EPA's Comments on the March 6 and 27, 2006 Sherwin-Williams documents regarding the use of the XRF sampler for screening of Hilliard's Creek soil samples

EPA has reviewed SWC's March 6, 2006 and March 27, 2006 proposal documents, *Use of XRF Analyses During Remedial Investigation of Hilliard's Creek* and *Clarification of Items Related to XRF Screening at Hilliard's Creek*, and offers the following comments.

a) Vertical Delineation - Based on the above proposal by EPA, EPA does not approve the vertical XRF sampling approach stated in the *Clarification of Items Related to XRF Screening at Hilliard's Creek*. Rather, it is the SWC's option to collect a soil sample, to be screened with the XRF, below EPA's proposed 24-30 inch interval. A confirmation sample is not necessary. However, if the XRF results indicate an exceedance, then a third sample may be proposed by SWC for TAL analysis, or if the data later (from the 24-30 inch interval) shows contamination, then EPA may request that SWC return to particular transects for additional vertical delineation.

b) Horizontal Delineation - EPA approves the XRF sampling approach presented by SWC in *Clarification of Items Related to XRF Screening at Hilliard's Creek*.

c) General Comments - Dry the samples to help minimize the effects of moisture in the samples. Use a mortar and pestle or equivalent to help ensure the soil particles are of approximately uniform size.

EPA's Comments on the March 3, 2006 Sherwin-Williams Company Field Change Request Form #18, *Background Sampling Event- Relocation of Silver Lake Proposed Background Sample Location*

Block 8.02, Lot 3.04 is an acceptable background location for both sediment and surface water collection. EPA approves the following Sherwin-Williams Company Field Change Request Form: #18 *Background Sampling Event - Relocation of Silver Lake Proposed Background Sample Location*, a signed copy of approval is attached. (Attachment #2).

EPA's Comments regarding the March 3, 2006 e-mail (from Mary Lou Capichioni to Ray Klimcsak) regarding pesticides/PCB data from Hilliard's Creek

EPA concurs with the proposed resampling plan regarding pesticides/PCBs as indicated in the March 3, 2006 e-mail. Excerpts of this e-mail are provided below:

"following your discussions with Steve Clough regarding the rejection of pesticide/PCB data from Hilliard Creek, the team completed some additional evaluations. The attached figure identifies the sample locations where at least one sample had all of the pesticide/PCB data rejected. The attached table indicates which specific samples had all of the pesticide/PCB data rejected. As indicated in the figure and table, half of the pesticide/PCB data collected from 4 sample locations on transect 123 were rejected. As was indicated in our January 18, 2006 letter - the data was rejected due to low surrogate recoveries. This issue may be related to matrix interference problems but our evaluation was inconclusive. Due to the proximity of these samples to Bridgewood Lake, we believe this data gap should be filled. The 4 sample locations on transect 123 (HCSB001 - HCSB004) at which the pesticide/PCB data were rejected were those collected at the five-foot intervals from the top of the stream bank. Given the proximity of these samples to each other and consistent with the proposed change to the sample locations we discussed at our December meeting, Sherwin-Williams is proposing to return to transect 123 and collect samples from a single boring at the top of the bank. Samples would be collected from the 0 - 0.5 and 1.5 - 2.0 foot intervals and analyzed for pesticide/PCBs to replace the rejected data set.

if the reanalysis yields similar results (i.e., data rejected due to low surrogate recoveries), then we will need to discuss the necessity of additional sampling attempts - or possible other alternatives."

Residential Well Survey Summary

Attached is an updated copy of EPA's "information sheet". In addition, an explanation should be

provided as to why the home at 24 Kresson-Gibbsboro Road was not detected during the initial 2004 Well Survey. (Attachment #3)

Kirkwood Lake Sampling Proposal

Finally, EPA is requesting that the Sherwin-Williams Company prepare a Technical Memorandum, consistent with the sampling approach outlined in the May 2003 RI/FS Work Plan (page 5-27), which presents a proposal to collect soil, sediment and surface water samples (including a list of the COPCs to be analyzed for) from within Kirkwood Lake.

Based on the soil and sediment data collected along Hilliard's Creek, particularly those from transects HCT-1 and HCT-5 during the 2005 RI field sampling activities; EPA is requesting that the Sherwin-Williams Company prepare a Technical Memorandum, consistent with the sampling approach outlined in the May 2003 RI/FS Work Plan (page 5-27), which presents a proposal to collect soil, sediment and surface water samples (including a list of the COPCs to be analyzed for) from transects within Kirkwood Lake. It is expected that the sampling approach would be similar to that employed at Bridgewood Lake.

If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

Enclosures

cc: Allen Danzig, Esq., SWC w/encls.
John Gerulis, SWC w/encls.
Sally Jones, Weston w/encls.
John Doyon, NJDEP w/encls.

Susanne Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione w/encls.